



January 18, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *5GAA Petition for Waiver to Allow Deployment of Cellular Vehicle-to-Everything (C-V2X) Technology in the 5.9 GHz Band; GN Docket 18-357*

Dear Ms. Dortch:

As a member of the 5G Automotive Association (“5GAA”), Savari Inc writes in strong support of recent waiver request submitted by 5GAA. Throughout his tenure at the Federal Communications Commission (“Commission”), Chairman Ajit Pai has sought to ensure that the agency’s regulatory regimes accurately reflect the current realities of the marketplaces they address. Ultimately, this emphasis has benefitted consumers in the form of access to better quality services at lower prices. The Commission can take another action consistent with this approach by granting 5GAA’s waiver request to allow for the near term deployment of Cellular Vehicle-to-Everything (“C-V2X”) technology in the upper 20 megahertz of the 5.9 GHz band. Not only will a grant of the waiver request better reflect the realities of the current marketplace, but it also will ensure that America is not left behind as the technology continues to progress.

Savari Inc is established in 2008 with the sole goal of deploying V2X technology around the world. The roots of our company has started with UC Berkeley, became a strong Tier-2 supplier for the CAMP Consortium. We have supported nationally significant activities like the Safety Pilot in Ann Arbor to working with various OEMs in US, EU and China for their production programs. Savari builds software and hardware sensor solutions for automotive car manufacturers, the automotive aftermarket and smart cities. With more than 150 man-years of V2X learning and development and 15 million-plus miles per year of public testing, Savari is a leader in V2X technology. Savari is headquartered in Santa Clara, Calif., and has offices in Detroit, Mich., Munich, Germany, Seoul, Korea, Bengaluru, India, Shanghai, China. For more information, visit savari.net.

Built on the foundation of earlier efforts to develop Vehicle-to-Everything (“V2X”) services, C-V2X is a modern, standards-based connected-vehicle communications technology. Leveraging 4G, and ultimately 5G, C-V2X enables direct communications between vehicles themselves, vehicles and vulnerable persons such as pedestrians and cyclists, and vehicles and roadside infrastructure, as well as

communications between vehicles and mobile networks. These communications hold the potential to enable important improvements in safety, traffic efficiency, mobility, and energy efficiency on America's roads.

Unfortunately, the Commission's current regulations threaten to stifle investment and innovation in C-V2X and threaten America's ability to play an active role in the progression of this technology. Specifically, the rules governing the 5.9 GHz band, which has been allocated for V2X services, limit operations in the band to those that comply with the Dedicated Short Range Communications standard. The Commission can begin to remediate this situation by granting 5GAA's waiver request.

Indeed, the current regulatory regime governing the 5.9 GHz band does not reflect the realities of the V2X marketplace. As 5GAA recently explained to the Commission, V2X stakeholders have reached an inflection point. C-V2X's advantages, which include capabilities that can enable new and improved ITS services, a path to 5G that will greatly expand and enhance C-V2X services in the future, and an unmatched cost efficiency that will support accelerated deployment, have persuaded many important global stakeholders to commit to C-V2X. For example, the Chinese Ministry of Industry and Information Technology recently adopted a spectrum allocation for C-V2X in China, the world's largest market for automobile sales. As regulators in other regions of the world consider similar allocation decisions, the United States risks being left behind as this technology continues to progress.

The FCC can help facilitate the advancement of C-V2X in the United States by granting 5GAA's waiver request. Importantly, the waiver request does not preclude the continued operations of DSRC technology. Rather, it merely will help to update the regulatory regime governing the 5.9 GHz band to better represent the realities of the V2X marketplace and afford interested stakeholders in the United States the flexibility to invest and innovate in a technology that is being adopted around the world. Ultimately, American travelers stand to benefit through increased access to safety and other services powered by C-V2X technology.



Ravi Puvvala
President & CEO,
Savari Inc